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6 **FRESNO COMMUNITY HOSPITAL AND**  
7 **MEDICAL CENTER d/b/a/ COMMUNITY**  
8 **MEDICAL CENTERS**

9 *(Additional Counsel Listed on Next Page)*

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 RAGINA BELL, individually and on  
13 behalf of all other similarly situated,

14 Plaintiff,

15 v.

16 **COMMUNITY MEDICAL CENTERS;**  
17 **and DOES 1-100, Inclusive,**

18 Defendants.  
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Case No.: 2:20-cv-02500-WBS-DS

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
CLASS ACTION COMPLAINT**

Current Response Due: Disputed  
New Response Due: 06/18/2021

Action Filed: 10/27/2020  
Removal Date: 12/17/2020  
FAC Filed: 04/20/2021

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12 *Attorneys for Plaintiff*  
13 RAGINA BELL  
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1 IT IS HEREBY STIPULATED AND AGREED, by and between RAGINA  
2 BELL (“Plaintiff”) and FRESNO COMMUNITY HOSPITAL AND MEDICAL  
3 CENTER d/b/a/ COMMUNITY MEDICAL CENTERS (“Community Medical  
4 Centers,” and together with Plaintiff, the “Parties”), by and through their respective  
5 attorneys, and subject to Court approval, that Community Medical Centers shall  
6 have an extension of time to respond to Plaintiff’s First Amended Class Action  
7 Complaint, up to and including June 18, 2021, without prejudice to seek further  
8 extension upon written agreement.

9 *Whereas*, on October 27, 2020, Plaintiff filed this action in the Superior  
10 Court of the State of California for the County of Sacramento;

11 *Whereas*, on December 17, 2020, former defendant Blackbaud, Inc.  
12 (“Blackbaud”) removed the action to this Court;

13 *Whereas*, that same day, on December 17, 2020, Plaintiff voluntarily  
14 dismissed Blackbaud from the case;

15 *Whereas*, Plaintiff did not serve defendant Community Medical Centers with  
16 a copy of the initial complaint;

17 *Whereas*, on April 20, 2021, Plaintiff filed her First Amended Class Action  
18 Complaint, and emailed a copy to counsel for Community Medical Centers;

19 *Whereas*, the Parties disagree about whether or not this was effective service,  
20 but have agreed to resolve this disagreement: Community Medical Centers agrees  
21 that service of the First Amended Class Action Complaint was effective as of May  
22 10, 2021, and Plaintiff agrees that Community Medical Centers’ response to  
23 Plaintiff’s First Amended Class Action Complaint shall be due June 18, 2021; and

24 *Whereas*, the Parties have not previously requested or obtained any extension  
25 of time for Community Medical Centers to respond to the First Amended Class  
26 Action Complaint.

27 Based on the facts above and the Parties’ agreement, it is hereby stipulated  
28 pursuant to Eastern District of California Local Rule 144, and subject to Court

1 approval, that Defendant may have up to and including June 18, 2021 to respond to  
2 the First Amended Complaint.

3 **IT IS SO STIPULATED.**  
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6 Dated: May 19, 2021

**BAKER & HOSTETLER LLP**

7 By: /s/ Teresa C. Chow  
8 Teresa C. Chow

9 *Attorneys for Defendant*  
10 FRESNO COMMUNITY HOSPITAL AND  
11 MEDICAL CENTER d/b/a/ COMMUNITY  
MEDICAL CENTERS

12 Dated: May 18, 2021

**CROSNER LEGAL, P.C.**

13  
14 /s/ Chad A. Saunders  
15 By: (as authorized on May 19, 2021)  
16 Zachary M. Crosner, Esq.  
17 Blake R. Jones, Esq.  
Chad A. Saunders, Esq.  
Michael R. Crosner, Esq.

18 *Attorneys for Plaintiff*  
19 RAGINA BELL  
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**ORDER**

The Court, having read and considered the Parties' Stipulation to Extend Time to Respond to Plaintiff's First Amended Class Action Complaint, and for good cause appearing, **HEREBY ORDERS** that Community Medical Centers may have up to and including June 18, 2021 to respond to the First Amended Class Action Complaint.

The Scheduling Conference is continued to **September 13, 2021 at 1:30 p.m.** A joint status report shall be filed no later than **August 30, 2021.**

**IT IS SO ORDERED.**

Dated: May 21, 2021



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE